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12 Attorneys for Defendant
Twitter, Inc.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 JOHN DOE #1 AND JOHN DOE #2,
18 Plaintiff,
19
20 v.
21 TWITTER, INC.,
22 Defendant.
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Case No. 3:21-cv-00485-JCS

**DECLARATION OF LINH K. NGUYEN IN
SUPPORT OF DEFENDANT TWITTER, INC.'S
MOTION FOR STAY**

Hearing Date: November 19, 2021
Hearing Time: 9:30 a.m.
Judge: Honorable Joseph C. Spero

1 I, Linh K. Nguyen, declare as follows:

2 1. I am an attorney licensed to practice law in California and am an associate at Cooley,
3 LLP and counsel of record for Defendant Twitter, Inc. (“Twitter”) in this matter. I make this
4 declaration based on my personal knowledge of this matter and information I obtained following a
5 reasonable investigation of the events described below. If called as a witness, I could and would
6 testify competently to the matters stated herein.

7 2. On October 4, 2021, Plaintiffs served on Twitter a First Combined Set of
8 Interrogatories, Requests for Production of Documents, and Requests for Admission (“Discovery
9 Requests”). The Discovery Requests include twenty-three interrogatories, twenty-three requests
10 for production, some with subparts, and nine requests for admission. Many are very broad, and
11 approximately 20 Requests are unbounded by any time limits.

12 3. On October 7, 2021, the parties met and conferred with Plaintiffs’ counsel regarding
13 a stay of discovery. On October 7, 2021, and again on October 15, 2021, Plaintiffs’ counsel
14 declined to agree to stay discovery or the proceedings pending the outcome of Twitter’s previously
15 filed motion for an order certifying the order denying in part Twitter’s motion to Dismiss (ECF No.
16 69, or the “Order”) for interlocutory appeal pursuant to 28 U.S.C. § 1292(b). (ECF No. 80.)

17 I declare under penalty of perjury that the foregoing is true and correct. This declaration
18 was executed on October 15, 2021 in San Diego, California.

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20 /s/ Linh K. Nguyen

21 Linh K. Nguyen
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